

May 6, 2021

VIA ECF ONLY

Hon. John Michael Vazquez
United States District Judge
United States P.O. & Courthouse
Federal Square
Newark, New Jersey 07101

**Re: *USA v. Andrews, et al.*
Criminal No. 20-578-JMV**

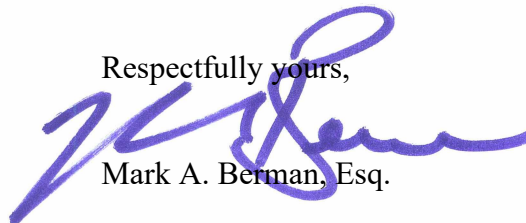
Dear Judge Vazquez:

This firm represents Defendant Adam Brosius in the above-referenced matter. Pretrial motions currently are due to be filed on or before June 15, 2021. All Defendants hereby jointly request a 60-day extension of time within which to file pretrial motions. The reasons for this request are as follows:

- 1) Counsel continue to review the substantial quantity of documents produced by the government in discovery but that review has not been completed despite counsel's diligent efforts. Counsel expect their respective reviews to be completed within the 60-day extension period.
- 2) Restrictions on in-person meetings have made it difficult to meet with their clients in person to review the discovery. It is expected that those restrictions will be lifted within the 60-day extension period, thereby facilitating counsel's interaction with their respective clients.
- 3) The government will not be prejudiced by the requested extension because the Court's re-opening plan envisions priority being given to short, single-defendant matters once jury trials resume and, consequently, it is unlikely that his multi-defendant matter will be scheduled for trial in the near future.

If the Court would like counsel to make a formal motion requesting the extension, we will do so.

Respectfully yours,



Mark A. Berman, Esq.

cc: All Counsel of Record (via ECF)